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FEDERAL ELECTION COMMISSION  
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IN AND BEFORE THE

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FEDERAL ELECTION COMMISSION

In re:

Rick Santorum, and  
Softer Voices

MUR 5831

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OFFICE OF GENERAL COUNSEL  
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RESPONSE AND OBJECTIONS TO  
COMPLAINT

This Response is filed on behalf of Rick Santorum and Softer Voices, whose custodian of records is Cynthia Young-Palmer. The individual board members of Softer Voices have engaged in no acts necessitating their individual participation in this proceeding.

The Complaint in this MUR is another in a series of harassment FEC complaints filed by Stanley E. Levine against Sen. Rick Santorum and his campaign, none of which are grounded in any facts and none of which provide evidence of any violation of the Federal Election Campaign Act of 1971, as amended ("the Act"). The named Respondents hereby object to the complaint as groundless, frivolous and filed for the sole purpose of harassing Sen. Santorum.

Respondents have committed no violation of the Act and the Complaint, accordingly, should be dismissed.

Rick Santorum is the Republican Senator from Pennsylvania, seeking reelection to the United States Senate in November 2006 general election. The Complaint alleges that because Softer Voices paid the Intercollegiate Studies Institute ("ISI"), a book publisher, for rights to utilize excerpts from a book written by Sen. Santorum, that such payment is evidence of a violation of the Act. While Softer Voices did pay ISI for permission to use excerpts from the book, no excerpts were ultimately utilized by Softer Voices in its electioneering communication(s). In an abundance of caution and full disclosure, the payment to ISI by Softer Voices for the licensing rights to utilize excerpts was disclosed on the Form 9 filed by Softer Voices on September 20, 2006.

The rights to Sen. Santorum's book, *It Takes A Family*, are owned by ISI, not by Sen. Santorum personally and not by Santorum 2006, the principal authorized campaign committee of Rick Santorum for United States Senate.

The payment by Softer Voices to ISI is evidence that all disbursements by Softer Voices were made independently of any candidate or committee as stated on the advertisement about which Mr. Levine complains.

Neither Sen. Santorum nor Sen. Santorum's campaign committee have had any involvement with the publisher regarding this matter or its sale or license of the rights to *It Takes A Family* for use by Softer Voices. Complainant submitted no evidence whatsoever to support his allegations and none exists.

### **CONCLUSION**

For the reasons stated above and because neither the facts nor the law support further proceedings with respect to the Complaint, and because Respondents have committed no violation(s) of the Act, Sen. Santorum and Softer Voices respectfully move the Commission to dismiss the MUR and for such other necessary relief as deemed appropriate by the Commission.

Respectfully Submitted,



Cieta Mitchell, Esq.  
Foley & Lardner LLP  
3000 K Street, NW #500  
Washington, DC 20007  
(202) 295-4081  
(202) 672-5399 (facsimile)

Counsel for Respondents  
in MUR 5831

Submitted via hand delivery this 31st day of October, 2006

Office of General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

Attention Jeff Jordan, Esq., Supervisory Attorney  
Complaints Examination and Legal Administration



**FEDERAL ELECTION COMMISSION**  
**Office of General Counsel**  
**999 E Street, NW**  
**Washington, DC 20463**

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**STATEMENT OF DESIGNATION OF COUNSEL**  
Please use one form for each Respondent/Witness  
FAX (202) 219-3823

MUR: 5831

COUNSEL: Greta Mitchell

FIRM: Foley & Lardner, LLP

ADDRESS: 3000 K Street, NW-Site 500, Washington, DC 20007

TELEPHONE - OFFICE: (202) 295-4081

FAX: (202) 672-5399

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

10/31/06  
Date

Cynthia Young-Palmer  
Signature

Custodian of Records  
Title

RESPONDENT/WITNESS NAME (PRINT): Cynthia Young-Palmer, Custodian of Records

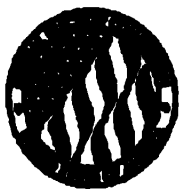
MAILING ADDRESS: P.O. Box 3588  
Softer Voices

Washington, DC 20027

TELEPHONE - HOME: ( )

OFFICE: (202) 945-6134

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(2)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.



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FAX (202) 219-3923

MOR: 5831

COUNSEL: Cleta Mitchell

FIRM: Foley & Lardner, LLP

ADDRESS: 3000 K Street, NW-Site 500, Washington, DC 20007

TELEPHONE - OFFICE: (202) 295-4081

FAX: (202) 672-5399

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and is act on my behalf before the Commission.

*Rick Santorum*

Date 10/23/06

Signature

Title

RESPONDENT/WITNESS NAME (PRINT): Rick Santorum

MAILING ADDRESS: One Tower Bridge, Suite 1440  
West Conshohocken, PA 19420

TELEPHONE - HOME: ( )

OFFICE: (610) 825-7035

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

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